



INDEPENDENT CATTLEMEN'S ASSOCIATION OF TEXAS, INC.

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October 11, 2005

The Honorable Mike Johanns
Secretary of Agriculture
1400 Independence Ave., SW
Washington, D.C. 20250

Dear Mr. Secretary:

The officers, directors and members of the Independent Cattlemen's Association of Texas feel that the privatization of the National Animal Identification System (NAIS) is an effort by the United States Department of Agriculture and a handful of selected industry partners to bypass the state animal health agencies. ICA leaders support the state agencies, which are the parties best suited to initiate and implement the NAIS program.

State animal health agencies already are designated as the operational custodians of the Premise Identification program. These agencies have made arrangements to staff and operate the Premise Identification program. In the event of animal disease outbreak or bioterrorism, the state agencies are the first responders due to the nature of their responsibilities and their proximity to the residents of their respective state. As first responders, the ability to access the information concerning place of origin and the event roadmap is crucial to their agency. In order for the 48-hour traceback to be accomplished in an efficient and timely manner, the logical administrators and custodians of the NAIS information are the state animal health agencies.

The state animal health agencies already have disbursed funds to create the administrative organizations for the Premise Identification program in their respective states. The most judicious use of this staff, equipment and technology is to "piggy back" the NAIS program along with the Premise Identification program. A significant savings to the producer should result from the establishment of a dual-purpose office. In Texas, for example, the future proposed fees for registering premises could also cover funding for NAIS. By not creating a separate, private concern to track and maintain the NAIS information, the cost savings would be significant to the producers and the beef industry.

The secure repository of all NAIS information is a major concern of all parties. During the USDA listening sessions, this item was tantamount only to the concern of the cost of the program. In the past, private companies have done a less than perfect job of safeguarding the peoples' information. Even large corporations such as credit card vendors have had their databases compromised. Realizing the enormous sums of money that have been spent by these credit giants to prevent intrusion of their data systems, it seems security would also be an expensive issue for a private, non-profit entity trying to

maintain informational integrity. The cost of such safeguards, if attainable in the private sector, would cause the NAIS program to be an economic noose around the necks of the producer and the beef industry in general. Government has long been the fortress of security for the information of its constituents. The state animal health agencies are the sensible choice as caretakers of animal data in the future.

A private, third-party entity administering the NAIS information on a not-for-profit basis is much like asking the fox to guard the hen house. Some industry partners, who readily seek to sponsor the program, might fall prey to the temptation to utilize the information within the system for political or economic gain. We cannot, in good conscience, allow this possibility to exist. The state agencies have nothing to gain politically or economically. The agencies are only able to accomplish their duties in a more efficient and timely manner. The inherent purpose of the program is to provide timely trace back in an emergency situation, nothing more.

Now is the time for the Secretary of Agriculture and the decision makers at USDA to rethink their position and to embark on a common sense approach to implement the NAIS program. Livestock producers are the most populous segment of the industry that will be affected by the implementation of NAIS. They deserve an efficient and economical program operated by our government. Therefore, it is requested by the Independent Cattlemen's Association of Texas that the USDA take steps immediately to allow the state animal health agencies to be the administrators of a logical, safe and responsive NAIS program.

Sincerely,

A handwritten signature in black ink, reading "Bruce Dopslauf". The signature is written in a cursive, flowing style with a large initial "B".

Bruce Dopslauf
State President